

independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.

186. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
187. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the telephone number to be switched.
188. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
189. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred interLATA/toll provider, an appropriately qualified independent third party did not record the verification in its entirety.
190. BOI does not possess an audio record that verifies authorization of a change made on or about May 22, 2002, of Mr. Brackett's preferred interLATA/toll provider to BOI.
191. BOI has never maintained an audio record that verifies authorization of a change made on or about May 22, 2002, of Mr. Brackett's preferred interLATA/toll provider to BOI.
192. BOI, through USBI and Verizon, billed Mr. Brackett for interLATA/toll service provided by BOI between May 22 and June 17, 2002.

193. Between May 15 and 22, 2002, Mr. Brackett did not authorize BOI to switch his preferred intraLATA/toll provider to BOI.
194. Between May 15 and 22, 2002, Mr. Brackett did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred intraLATA/toll provider to BOI.
195. Between May 15 and 22, 2002, Bruce Brackett did not authorize BOI to switch Mr. Brackett's preferred intraLATA/toll provider to BOI.
196. Between May 15 and 22, 2002, Bruce Brackett did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch Mr. Brackett's preferred intraLATA/toll provider to BOI.
197. Sometime between May 15 and 22, 2002, BOI submitted a request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI.
198. On May 22, 2002, Qwest submitted a change request to Verizon to change Mr. Brackett's preferred intraLATA/toll provider to BOI.
199. On May 22, 2002, Verizon changed Mr. Brackett's preferred intraLATA/toll provider to BOI.
200. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
201. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.

202. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain his oral authorization to do so from an appropriately qualified independent third party.
203. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain Bruce Brackett's written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
204. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain Bruce Brackett's electronic authorization to do so.
205. Before BOI submitted, in May 2002, its request to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, BOI did not obtain Bruce Brackett's oral authorization to do so from an appropriately qualified independent third party.
206. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the identity of the subscriber.
207. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit confirmation that the person on the call was authorized to make the carrier change.

208. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.
209. With respect to the request submitted in May 22, 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
210. With respect to the request submitted in May 2002, by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the telephone number to be switched.
211. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the type of service involved.
212. With respect to the request submitted in May 2002 by BOI to Qwest to change Mr. Brackett's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not record the verification in its entirety.
213. BOI does not possess an audio record that verifies authorization of a change made on or about May 22, 2002, of Mr. Brackett's preferred intraLATA/toll provider to BOI.

214. BOI has never maintained an audio record that verifies authorization of a change made on or about May 22, 2002, of Mr. Brackett's preferred intraLATA/toll provider to BOI.
215. BOI, through USBI and Verizon, billed Mr. Brackett for intraLATA/toll service provided by BOI between May 22 and June 17, 2002.

Norman Crowley Slamming

216. On January 29, 2002, a BOI employee called telephone number 207-375-8155 ("January 29 BOI Call").
217. The purpose of the January 29 BOI Call was to seek authorization for a change in that number's subscriber's preferred interLATA/toll and intraLATA/toll providers.
218. On January 29, 2002, a BOI employee spoke with a woman who answered at telephone number 207-375-8155.
219. On January 29, 2002, the billing name on the account for telephone number 207-375-8155 was Norman Crowley ("Mr. Crowley").
220. On January 29, 2002, Mr. Crowley's local exchange telephone service provider was Verizon.
221. Immediately prior to January 29, 2002, BOI was not Mr. Crowley's interLATA/toll or intraLATA/toll provider.
222. On January 29, 2002, Mr. Crowley did not authorize BOI to switch his preferred interLATA/toll provider to BOI.

223. On January 29, 2002, Mr. Crowley did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred interLATA/toll provider to BOI.
224. Sometime between January 29 and February 6, 2002, BOI submitted a request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI.
225. On February 6, 2002, Qwest submitted a change request to Verizon to change Mr. Crowley's preferred interLATA/toll provider to BOI.
226. On February 6, 2002, Verizon changed Mr. Crowley's preferred interLATA/toll provider to BOI.
227. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.¹
228. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
229. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI used Great Lakes Verification as its third party verifier.
230. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, the document attached hereto as

¹ For this request and requests numbered 228 through 233 and requests numbered 242 through 250, it shall be understood that BOI's change request was made sometime between January 29 and February 6, 2002.

Attachment B is a complete and accurate transcription of the January 29, 2002, conversation between a representative from Great Lakes Verification and the woman who answered telephone number 207-375-8155.

231. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
232. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the telephone number to be switched.
233. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
234. BOI does not possess an audio record that verifies authorization of a change made on or about February 6, 2002, of Mr. Crowley's preferred interLATA/toll provider to BOI.
235. BOI has never maintained an audio record that verifies authorization of a change made on or about February 6, 2002, of Mr. Crowley's preferred interLATA/toll provider to BOI.
236. BOI, through USBI and Verizon, billed Mr. Crowley for interLATA/toll service provided by BOI between February 6 and April 1, 2002.
237. On January 29, 2002, Mr. Crowley did not authorize BOI to switch his preferred intraLATA/toll provider for phone number 207-474-2170.

238. On January 29, 2002, Mr. Crowley did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred intraLATA/toll provider to BOI.
239. Sometime between January 29 and February 6, 2002, BOI submitted a request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI.
240. On February 6, 2002, Qwest submitted a change request to Verizon to change Mr. Crowley's preferred intraLATA/toll provider to BOI.
241. On February 6, 2002, Verizon changed Mr. Crowley's preferred intraLATA/toll provider to BOI.
242. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
243. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
244. Before BOI submitted its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI used Great Lakes Verification as its third party verifier.
245. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, the document attached hereto as Attachment B is a complete and accurate transcription of the January

29, 2002, conversation between a representative from Great Lakes Verification and the woman who answered telephone number 207-375-8155.

246. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit confirmation that the person on the call was authorized to make the carrier change.
247. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.
248. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
249. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the telephone number to be switched.
250. With respect to the request submitted by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the type of service involved.

251. BOI does not possess an audio record that verifies authorization of a change made on February 6, 2002, of Mr. Crowley's preferred intraLATA/toll provider to BOI.
252. BOI has never maintained an audio record that verifies authorization of a change made on February 6, 2002, of Mr. Crowley's preferred intraLATA/toll provider to BOI.
253. BOI, through USBI and Verizon, billed Mr. Crowley for intraLATA/toll service provided by BOI between February 6 and April 1, 2002.
254. On or about April 1, 2002, Mr. Crowley submitted a request to Verizon to change his preferred interLATA/toll and intraLATA/toll providers from BOI.
255. On or about April 1, 2002, Verizon changed Mr. Crowley's preferred interLATA/toll and intraLATA providers from BOI.
256. Between April 1 and 8, 2002, no one from BOI contacted Mr. Crowley.
257. In April 2002, section 258 of the Act required BOI to comply with the Commission's verification procedures before submitting a change in a subscriber's preferred interLATA/toll provider.
258. In April 2002, 47 C.F.R. § 64.1120 required BOI to obtain verification of the authorization to change a subscriber's preferred interLATA/toll provider.
259. In April 2002, section 258 of the Act required BOI to comply with the Commission's verification procedures before submitting a change in a subscriber's preferred intraLATA/toll provider.
260. In April 2002, 47 C.F.R. § 64.1120 required BOI to obtain verification of the authorization to change a subscriber's preferred intraLATA/toll provider.

261. Between April 1 and 8, 2002, Mr. Crowley's local exchange telephone service provider was Verizon.
262. Between April 1 and 8, 2002, Mr. Crowley's interLATA/toll and intraLATA/toll providers were not BOI.
263. Between April 1 and 8, 2002, Mr. Crowley did not authorize BOI to switch his preferred interLATA/toll provider to BOI.
264. Between April 1 and 8, 2002, Mr. Crowley did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred interLATA/toll provider to BOI.
265. Sometime between April 1 and 8, 2002, BOI submitted a request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI.
266. On April 8, 2002, Qwest submitted a change request to Verizon to change Mr. Crowley's preferred interLATA/toll provider to BOI.
267. On April 8, 2002, Verizon changed Mr. Crowley's preferred interLATA/toll provider to BOI.
268. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
269. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.

270. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred interLATA/toll provider to BOI, BOI did not obtain his oral authorization to do so from an appropriately qualified independent third party.
271. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the identity of the subscriber.
272. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call was authorized to make the carrier change.
273. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.
274. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
275. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the telephone number to be switched.

276. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
277. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred interLATA/toll provider, an appropriately qualified independent third party did not record the verification in its entirety.
278. BOI does not possess an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Crowley's preferred interLATA/toll provider to BOI.
279. BOI has never maintained an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Crowley's preferred interLATA/toll provider to BOI.
280. BOI, through USBI and Verizon, billed Mr. Crowley for interLATA/toll service provided by BOI between April 8, 2002 and April 29, 2002.
281. Between April 1 and 8, 2002, Mr. Crowley did not authorize BOI to switch his preferred intraLATA/toll provider to BOI.
282. Between April 1 and 8, 2002, Mr. Crowley did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred intraLATA/toll provider to BOI.
283. Sometime between April 1 and 8, 2002, BOI submitted a request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI.
284. On April 8, 2002, Qwest submitted a change request to Verizon to change Mr. Crowley's preferred intraLATA/toll provider to BOI.

285. On April 8, 2002, Verizon changed Mr. Crowley's preferred intraLATA/toll provider to BOI.
286. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
287. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
288. Before BOI submitted, in April 2002, its request to Qwest to change Mr. Crowley's preferred intraLATA/toll provider to BOI, BOI did not obtain his oral authorization to do so from an appropriately qualified independent third party.
289. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not elicit the identity of the subscriber.
290. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call was authorized to make the carrier change.
291. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately

qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.

292. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
293. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not elicit the telephone number to be switched.
294. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
295. With respect to the request submitted in April 2002 by BOI to Qwest to change Mr. Crowley's preferred intraLATA/toll provider, an appropriately qualified independent third party did not record the verification in its entirety.
296. BOI does not possess an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Crowley's preferred intraLATA/toll provider to BOI.
297. BOI has never maintained an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Crowley's preferred intraLATA/toll provider to BOI.

298. BOI, through USBI and Verizon, billed Mr. Crowley for intraLATA/toll service provided by BOI between April 8 and 29, 2002.

Donald and Ida Guptill Slamming

299. In February 2002, section 258 of the Act required BOI to comply with the Commission's verification procedures before submitting a change in a subscriber's preferred interLATA/toll provider.
300. In February 2002, 47 C.F.R. § 64.1120 required BOI to obtain verification of the authorization to change a subscriber's preferred interLATA/toll provider.
301. In February 2002, section 258 of the Act required BOI to comply with the Commission's verification procedures before submitting a change in a subscriber's preferred intraLATA/toll provider.
302. In February 2002, 47 C.F.R. § 64.1120 required BOI to obtain verification of the authorization to change a subscriber's preferred intraLATA/toll provider.
303. On February 28, 2002, a BOI employee called telephone number 207-698-1850 ("February 28 BOI Call").
304. The purpose of the February 28 BOI Call was to seek authorization for a change in that number's subscriber's preferred interLATA/toll and intraLATA/toll providers.
305. On February 28, 2002, a BOI employee spoke with Ida Guptill ("Mrs. Guptill") at telephone number 207-698-1850.
306. On February 28, 2002, the billing name on the account for telephone service for telephone number 207-698-1850 was Donald Guptill ("Mr. Guptill").

307. On February 28, 2002, Mr. Guptill's local exchange telephone service provider was Verizon.
308. Immediately prior to February 28, 2002, Mr. Guptill's interLATA/toll and intraLATA/toll provider was Vartec.
309. On February 28, 2002, neither Mr. Guptill nor Mrs. Guptill authorized BOI to switch Mr. Guptill's preferred interLATA/toll provider to BOI.
310. On February 28, 2002, neither Mr. Guptill nor Mrs. Guptill verified, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that Mr. Guptill wished to switch his preferred interLATA/toll provider to BOI.
311. Between February 28 and March 1, 2002, BOI submitted a request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI.
312. On March 1, 2002, Qwest submitted a change request to Verizon to change Mr. Guptill's preferred interLATA/toll provider to BOI.
313. On March 1, 2002, Verizon changed Mr. Guptill's preferred interLATA/toll provider to BOI.
314. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI,² BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.

² For this request and requests numbered 315 through 322 and requests numbered 331 through 339, it shall be understood that BOI's change request was made between February 28 and March 1, 2002.

315. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
316. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI did not obtain Mrs. Guptill's written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
317. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI did not obtain Mrs. Guptill's electronic authorization to do so.
318. Before BOI submitted request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI used Great Lakes Verification as its third party verifier.
319. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, the document attached hereto as Attachment C is a complete and accurate transcription of the February 28, 2002, conversation between a representative from Great Lakes Verification and Mrs. Guptill.
320. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.

321. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
322. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
323. BOI does not possess an audio record that verifies authorization of a change made on March 1, 2002, of Mr. Guptill's preferred interLATA/toll provider to BOI.
324. BOI has never maintained an audio record that verifies authorization of a change made on March 1, 2002, of Mr. Guptill's preferred interLATA/toll provider to BOI.
325. BOI, through USBI and Verizon, billed Mr. Guptill for interLATA/toll service provided by BOI between March 1 and 28, 2002.
326. On February 28, 2002, neither Mr. Guptill nor Mrs. Guptill authorized BOI to switch Mr. Guptill's preferred intraLATA/toll provider to BOI.
327. On February 28, 2002, neither Mr. Guptill nor Mrs. Guptill verified, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that Mr. Guptill wished to switch his preferred intraLATA/toll provider to BOI.
328. Between February 28 and March 1, 2002, BOI submitted a request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI.

329. On March 1, 2002, Qwest submitted a change request to Verizon to change Mr. Guptill's preferred intraLATA/toll provider to BOI.
330. On March 1, 2002, Verizon changed Mr. Guptill's preferred intraLATA/toll provider to BOI.
331. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
332. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
333. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, BOI did not obtain Mrs. Guptill's written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.
334. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, BOI did not obtain Mrs. Guptill's electronic authorization to do so.
335. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, BOI used Great Lakes Verification as its third party verifier.
336. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, the document attached

hereto as Attachment C is a complete and accurate transcription of the February 28, 2002, conversation between a representative from Great Lakes Verification and Mrs. Guptill.

337. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.
338. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.
339. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred intraLATA/toll provider to BOI, an appropriately qualified independent third party did not elicit the type of service involved.
340. BOI does not possess an audio record that verifies authorization of a change made on March 1, 2002, of Mr. Guptill's preferred intraLATA/toll provider to BOI.
341. BOI has never maintained an audio record that verifies authorization of a change made on March 1, 2002, of Mr. Guptill's preferred intraLATA/toll provider to BOI.
342. BOI, through USBI and Verizon, billed Mr. Guptill for intraLATA/toll service provided by BOI between March 1 and 28, 2002.

343. Between March 28 and April 8, 2002, no one from BOI contacted Mr. Guptill regarding a change of his inter/LATA toll or intra/LATA toll provider to BOI.
344. Between March 28 and April 8, 2002, Mr. Guptill's local exchange telephone service provider was Verizon.
345. Between March 28 and April 8, 2002, BOI was not Mr. Guptill's interLATA/toll or intraLATA/toll provider.
346. Between March 28 and April 8, 2002, Mr. Guptill did not authorize BOI to switch his preferred interLATA/toll provider to BOI.
347. Between March 28 and April 8, 2002, Mr. Guptill did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred interLATA/toll provider to BOI.
348. Sometime between March 28 and April 8, 2002, BOI submitted a request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI.
349. On April 8, 2002, Qwest submitted a change request to Verizon to change Mr. Guptill's preferred interLATA/toll provider to BOI.
350. On April 8, 2002, Verizon changed Mr. Guptill's preferred interLATA/toll provider to BOI.
351. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI,³ BOI did not obtain his written or electronically signed authorization to do so in a form that met the requirements of 47 C.F.R. § 64.1130.

³ For this request and requests numbered 349 through 358 and requests numbered 367 through 376, it shall be understood that BOI's change request was made between March 28 and April 8, 2002.

352. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI did not obtain his electronic authorization to do so.
353. Before BOI submitted its request to Qwest to change Mr. Guptill's preferred interLATA/toll provider to BOI, BOI did not obtain his oral authorization to do so from an appropriately qualified independent third party.
354. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the identity of the subscriber.
355. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call was authorized to make the carrier change.
356. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit confirmation that the person on the call wanted to make the carrier change.
357. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the names of the carriers affected by the change.

358. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the telephone number to be switched.
359. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not elicit the type of service involved.
360. With respect to the request submitted by BOI to Qwest to change Mr. Guptill's preferred interLATA/toll provider, an appropriately qualified independent third party did not record the verification in its entirety.
361. BOI does not possess an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Guptill's preferred interLATA/toll provider to BOI.
362. BOI has never maintained an audio record that verifies authorization of a change made on April 8, 2002, of Mr. Guptill's preferred interLATA/toll provider to BOI.
363. BOI, through USBI and Verizon, billed Mr. Guptill for interLATA/toll service provided by BOI between April 8 and 27, 2002.
364. Between March 28 and April 8, 2002, Mr. Guptill did not authorize BOI to switch his preferred intraLATA/toll provider to BOI.
365. Between March 28 and April 8, 2002, Mr. Guptill did not verify, in accordance with the Commission's procedures set out in 47 C.F.R. § 64.1120, that he wished to switch his preferred intraLATA/toll provider to BOI.